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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, : Case No. 2:19-cr-296
Plaintiff, :
v. :
SIGALA SALAZAR, :
Defendant. :
: **STIPULATION TO**
EXTEND PRE-TRIAL MOTION
DEADLINES

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Supriya Prasad, Assistant United States Attorney, counsel for the United States of America (hereinafter “the Government”), and Nicholas Wooldridge, Wooldridge Law Ltd., counsel for Sigala Salazar (“the Defendant”) (collectively, “the Parties”), that the pre-trial motions currently ordered to be filed on or before May 1, 2020, be vacated and extended an additional thirty (30) days, as well as the corresponding oppositions and reply deadlines.

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1 The Stipulation is entered into for the following reasons:

2 1. The additional time requested herein is not sought for purposes of delay, but to
3 permit counsel for the defendant to complete his investigation in this case to determine
4 whether pre-trial motions will be necessary.

5 2. The defendant is incarcerated and does not object to the continuance.

6 3. The parties agree to the continuance.

7 4. The additional time requested herein is not sought for purposes of delay, but
8 merely to allow counsel for defendant sufficient time within which to be able to effectively
9 and complete investigation.

10 5. Denial of this request for continuance would waste limited judicial resources, and
11 deny counsel for the defendant sufficient time to effectively represent the defendant.

12 6. Additionally, denial of this request for continuance could result in a miscarriage
13 of justice.

14 This is the First Stipulation to continue the motion scheduled filed herein.

15 DATED: April 28, 2020

16 WOOLDRIDGE LAW, LTD.

17 By /s/ Nicholas M. Wooldridge
18 NICHOLAS M. WOOLDRIDGE
19 Counsel for Defendant

20 NICHOLAS A. TRUTANICH
21 U.S. Attorney

22 By /s/ Supriya Prasad
23 Supriya Prasad
24 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
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: **STIPULATION TO
EXTEND PRE-TRIAL
MOTIONS DEADLINE**

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

Court finds that:

1. Counsel for the defendant needs additional time to conduct his investigation in this case in order to determine whether there are any issues that must be litigated and whether pre-trial motions need to be filed.

2. The defendant does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay.

Denial of this request for continuance would waste limited judicial resources, and deny counsel for the defendant sufficient time to effectively represent the defendant

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

1 **CONCLUSIONS OF LAW**

2 The ends of justice are served by granting said extension.

3 **ORDER**

4 **IT IS THEREFORE ORDERED** that the deadline to file pre-trial motions is
5 continued to June 1, 2020. Responses due by June 15, 2020. Replies due by June 22, 2020.

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7 DATED this 30th day of April, 2020.

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9 
10 UNITED STATES DISTRICT JUDGE